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MAR 28 2005

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b))
FM Table of Allotments)
(Mt. Enterprise, Texas and)
Hodge, Louisiana))

Federal Communications Commission
Office of Secretary

MB Docket No. 05-34
RM-10761

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To: The Secretary
For transmission to: Assistant Chief, Audio Division

COUNTERPROPOSAL OF E-STRING WIRELESS, LTD.

E-String Wireless, Ltd. ("E-String"), permittee of a new FM station on Channel 230A (93.9 MHz), Lufkin, Texas,¹ hereby supports the assignment of Channel 231A at Mt. Enterprise, Texas, provided the allotment is made at coordinates slightly different from those specified in the *Notice of Proposed Rulemaking* ("NPRM"), DA 05-296 (released February 4, 2005). In support whereof, the following is shown:

In an application contemporaneously filed by E-String, the permittee proposes a change in transmitter sites for its new Lufkin station. The site change is necessary to optimize coverage of the Lufkin-Nacogdoches, Texas market where the new station will operate. The new site is fully spaced under Section 73.207 of the rules, and meets city-grade coverage requirements for Lufkin. See Allocations Statement (attached).

The new site is short spaced to the coordinates specified in the NPRM by 6.4 kilometers. As a result, E-String's application constitutes a timely counterproposal to the Mt. Enterprise allotment. However, as shown in the attached Allocations Statement, if the coordinates for the new Mt. Enterprise allotment are changed to 32-01-48 North, 94-

¹ File No. BNPH-20050103AHW, Facility ID No. 164167, granted March 3, 2005.

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39-38 West, the allotment would be fully spaced to E-String's proposed site. The Allocations Statement also shows that from these coordinates, a new station at Mt. Enterprise would be fully spaced to all other stations and allotments and that city-grade service could be provided to the Mt. Enterprise.

Under these circumstances, the public interest would be served by accommodating E-String's site selection at Lufkin, as reflected in its modification application, and the assignment of the Mt. Enterprise facility at the coordinates specified herein.

Respectfully submitted,

E-STRING WIRELESS, LTD.

By: _____


Harry C. Martin
Its Attorney

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1300 North 17th Street, 11th Floor
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703-812-0415

March 28, 2005

ALLOCATION STATEMENT

This statement is prepared on behalf of E-String Wireless, Ltd. ("E-String") as a counterproposal to RM-10761, which seeks the allocation of Channel 231A to Mount Enterprise, Texas at 31°59'40" North, 94°40'29" West.

This counterproposal requests that the coordinates at Mount Enterprise be changed to 31°01'48" North, 94°39'38" West. **Exhibit A** is an allocation study of this reference site showing that as a Class A allocation it clears all applicable assignments including the new reference coordinates filed for by E-String for Channel 230A Lufkin in its contemporaneously-filed application to modify BNPH-20050103AHW (Facility ID No. 164167), granted March 3, 2005. The new reference coordinates requested for Channel 230A at Lufkin are 31°23'00" North, 94°47'50" West. These reference coordinates are short-spaced to the currently- proposed Mr. Enterprise coordinates by 6.4 kilometers. As shown in **Exhibit B**, the new Mount Enterprise reference site is 12.6 kilometers northeast of Mount Enterprise, Texas. From that site the entire city of Mount Enterprise will receive 70 dBu or better service, as required by §73.315(a) and §73.315(b) of the FCC's Rules. This demonstrates compliance with all requirements as set forth in §73.207 of the FCC Rules.

Using these reference coordinates, the coverage from this proposed site was calculated according to §73.313 of the Rules. The 60 dBu (1 mV/m) contour will encompass 2428 square kilometers of land area and 35,822 persons.

The coordinates for the existing Lufkin 230A construction permit are 31°20'18" North, 94°41'16" West. E-String requests that new reference coordinates for Lufkin be changed to 31°23'00" North, 94°47'50" West. **Exhibit C** is an allocation study of the new Lufkin 230A reference site as Class

A showing that it clears all applicable assignments. As shown in **Exhibit D**, the new Lufkin reference site is 8.2 kilometers north-west of Lufkin, Texas, where the entire city of Lufkin can be served with the 70 dBu contour as required by §73.315(a) and §73.315(b) of the FCC Rules. This demonstrates compliance with all requirements as set forth in §73.207 of the FCC Rules.

Using these reference coordinates, the coverage from this proposed site was calculated according to §73.313 of the Rules. The 60 dBu (1 mV/m) contour will encompass 2,527 square kilometers of land area and 102,289 persons.

I, Bret Huggins, am general partner in E-String Wireless, Ltd. All statements made herein are true and correct to the best of my knowledge and belief.

March 28, 2005

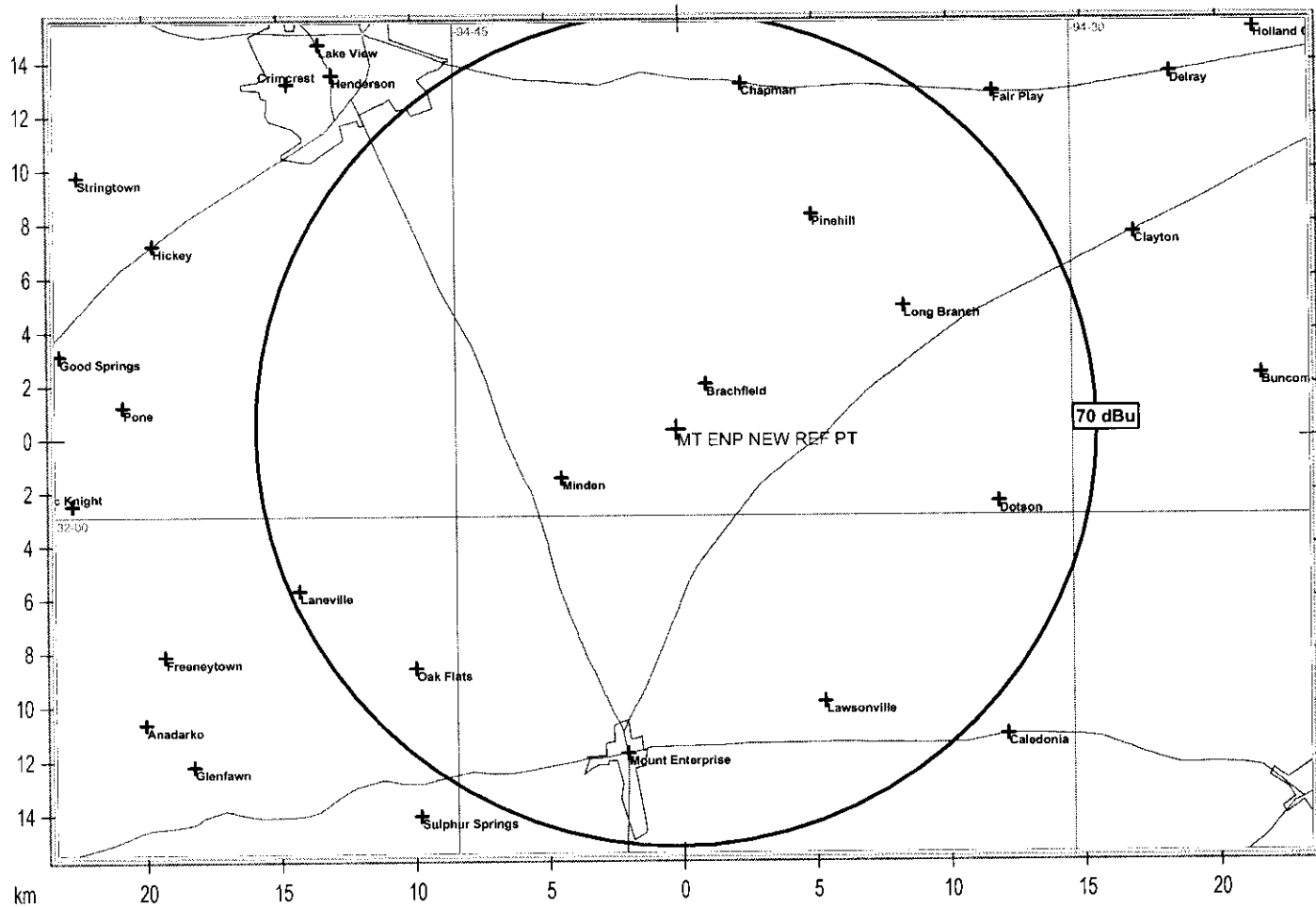
/s/ Bret Huggins

EXHIBIT A

MOUNT ENTERPRISE PROPOSED REF POINT 31 - 01 - 48 N, 94 - 39 - 38 W

ALLOCATION STUDY FROM NEW PROPOSED REF POINT FOR MOUNT ENTERPRISE

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr	Lat	Lon
	LA	HODGE	94.1	231	0	C2	APP	158.7	166	-7.3		
KQXY-FM	TX	BEAUMONT	94.1	231	100000	C1	APP	193.93	200	-6.1		
KLNO	TX	FORT WORTH	94.1	231	44000	C	LIC	223.85	226	-2.1		
NEW TOWER	TX	LUFKIN	93.9	230	6000	A		69.67	72	-2.3		
KLNO	TX	FORT WORTH	94.1	231	100000	C	LIC	224.53	226	-1.5		
KLNO	TX	FORT WORTH	94.1	231	98000	C	LIC	226.12	226	0.1		
KLNO	TX	FORT WORTH	94.1	231	0	C	USE	226.12	226	0.1		
NEW REP PT LUFKIN	TX	LUFKIN	93.9	230	6000	A	ADD	72.86	72	0.9	31-23-00.0 N	94-47-50.0 W
	LA	HODGE	94.1	231	0	C2	ADD	168.3	166	2.3		
KRUF	LA	SHREVEPORT	94.5	233	0	C	USE	98.65	95	3.6		
KRUF	LA	SHREVEPORT	94.5	233	99000	C	LIC	98.65	95	3.6		
KRUF	LA	SHREVEPORT	94.5	233	100000	C	CP	98.31	95	3.3		
KXKS-FM	LA	SHREVEPORT	93.7	229	0	C	USE	99.55	95	4.5		
KXKS-FM	LA	SHREVEPORT	93.7	229	95000	C	LIC	99.55	95	4.5		
	TX	GRAPELAND	94.3	232	0	C3	APP	96.56	89	7.6		
KQXY-FM	TX	BEAUMONT	94.1	231	100000	C1	LIC	221.41	200	21.4		
	TX	BEAUMONT	94.1	231	0	C1	DEL	221.41	200	21.4		
KQXY-FM	TX	BEAUMONT	94.1	231	0	C1	USE	221.41	200	21.4		
	TX	ORANGE	94.1	231	0	C1	ADD	224.04	200	24		



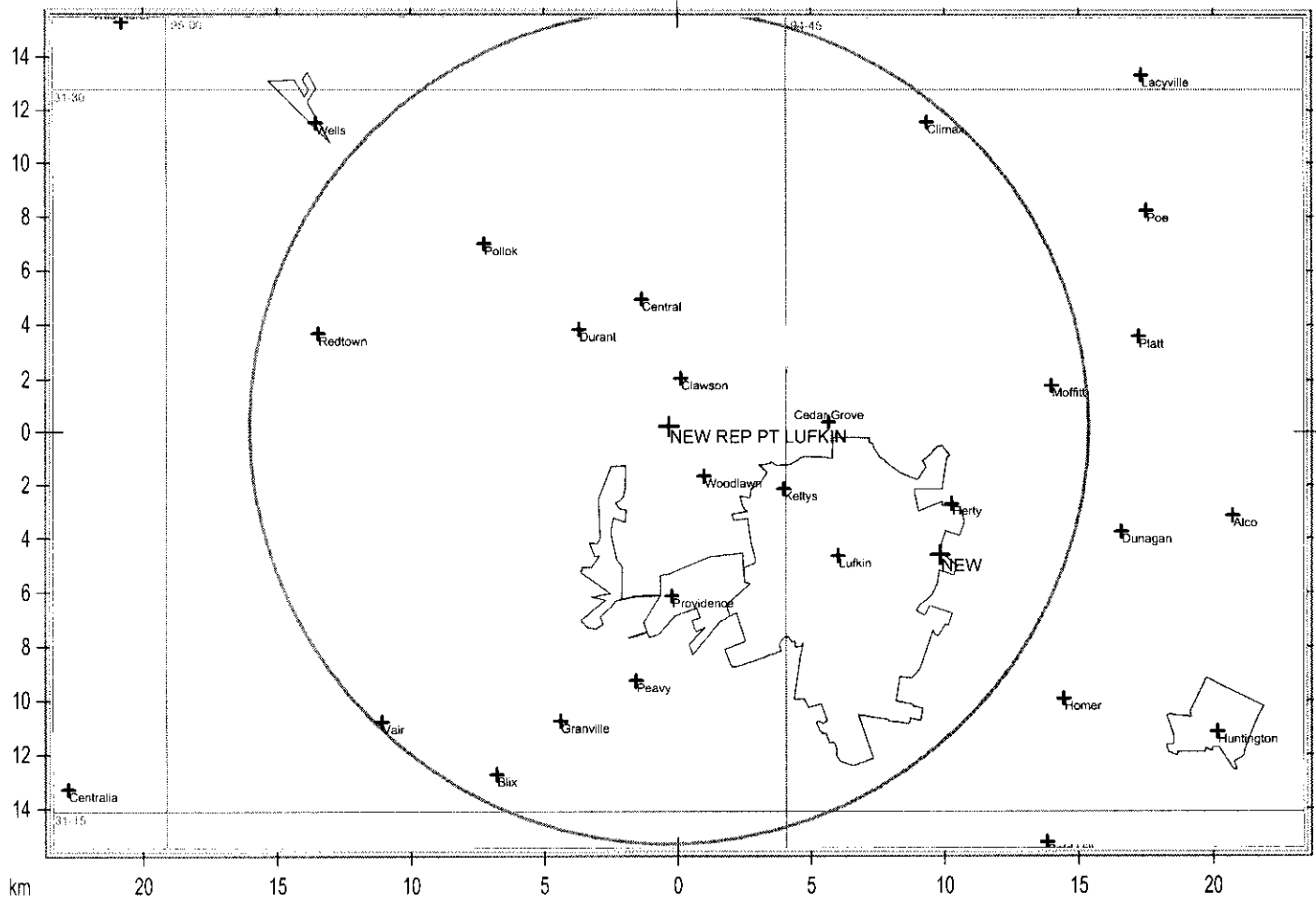
State Borders City Borders Highways Lat/Lon Grid

EXHIBIT C

PROPOSED NEW REF POINT FOR LUFKIN, TEXAS ALLOCATION STUDY (LAT / LON 31 - 23 - 00 N, 94 - 47 - 50 W)

Callsign	State	City	Freq	Channel	ERP_w	Class	Status	Distance_km	Sep	Clr
NEW	TX	LUFKIN	93.9	230	6000	A	CP	11.55	115	-103.5
MOUNT ENTERPRISE	TX	MOUNT ENTERPRISE	94.1	231	0	A	ADD	68.75	72	-3.3
KQXY-FM	TX	BEAUMONT	94.1	231	100000	C1	APP	131.57	133	-1.4
KXKS-FM	LA	SHREVEPORT	93.7	229	95000	C	LIC	165.33	165	0.3
KXKS-FM	LA	SHREVEPORT	93.7	229	0	C	USE	165.33	165	0.3
MT ENTRP NEW REF P	TX	MOUNT ENTERPRISE	94.1	231	6000	A	ADD	72.86	72	0.9
KBHT	TX	CROCKETT	93.5	228	0	C2	USE	65.02	55	10
KQXY-FM	TX	BEAUMONT	94.1	231	100000	C1	LIC	159.94	133	26.9
	TX	BEAUMONT	94.1	231	0	C1	DEL	159.94	133	26.9
KQXY-FM	TX	BEAUMONT	94.1	231	0	C1	USE	159.94	133	26.9
	TX	ORANGE	94.1	231	0	C1	ADD	165.74	133	32.7

Map Header



Map Footer

State Borders City Borders Lat/Lon Grid

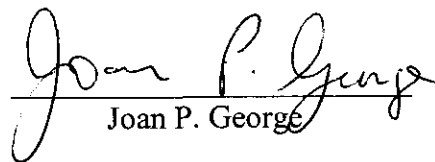
CERTIFICATE OF SERVICE

I, Joan P. George, a secretary in the law firm of Fletcher, Heald & Hildreth, do hereby certify that a true copy of the *Counterproposal of E-String Wireless, Ltd.* was sent this 28th day of March, 2005 by e-mail where indicated, and via United States First Class Mail, postage prepaid, to the following:

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